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Attorneys for Plaintiff  
United States of America

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
BLAKE WAYNE REED,  
  
Defendant.

CASE NO: 1:23-CR-00101-NODJ-BAM

STIPULATION TO CONTINUE STATUS  
CONFERENCE AND REGARDING  
EXCLUDABLE TIME PERIODS UNDER SPEEDY  
TRIAL ACT; ORDER

DATE: December 13, 2023  
TIME: 1:00 p.m.  
COURT: Hon. Barbara A. McAuliffe

THE PARTIES HEREBY STIPULATE, through their respective attorneys of record, Assistant United States Attorney Brittany M. Gunter, counsel for the government, and Erin Snider, counsel for Blake Wayne Reed (“defendant”), that this action’s **Wednesday, December 13, 2023, at 1:00 p.m., status conference be continued to Wednesday, February 28, 2024, at 1:00 p.m.** The parties likewise ask the court to endorse this stipulation by way of formal order.

The parties base this stipulation on good cause. Specifically,

1. The grand jury returned an indictment regarding this matter on May 25, 2023. Dkt. 1. Since that time, the parties agreed to and presented to the court a stipulation and proposed protective order regarding the production of third parties’ personal information without redactions, which the court endorsed by way of formal order on June 16, 2023. Dkt. 13. The government then prepared and delivered an initial set of discovery to defense counsel within

the time limits set forth by Eastern District of California Local Rule 440.

2. The government produced supplemental discovery subject to the protective order to the defense on July 19, 2023.
3. The government produced additional supplemental discovery to the defense on September 26, 2023. The defense is and has been reviewing discovery thus far provided.
4. The government currently believes all discovery has been produced pursuant to Rule 16. If the government identifies additional information that should be produced as supplemental discovery, the government will promptly produce it in accord with Rule 16.
5. Defense counsel needs more time to complete its review of the discovery, conduct any additional investigation, and communicate with both the defendant and government counsel about any potential pretrial resolution of this case.
6. Defense counsel believes that failure to grant the above-requested continuance would deny her the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
7. The government does not object to the continuance.
8. The parties therefore stipulate that the period of time from December 13, 2023, through and including February 28, 2024, is excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i) and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO STIPULATED.

Dated: December 5, 2023

PHILLIP A. TALBERT  
United States Attorney

By: /s/ BRITTANY M. GUNTER  
BRITTANY M. GUNTER  
Assistant United States Attorney

1 Dated: December 5, 2023

By: /s/ ERIN SNIDER  
ERIN SNIDER  
Counsel for Defendant

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3  
4 **ORDER**

5 IT IS ORDERED that the status conference currently set for December 13, 2023, at 1:00 pm is  
6 continued until **Wednesday, February 28, 2024, at 1:00 p.m. before Magistrate Judge Barbara A.**  
7 **McAuliffe.**

8 IT IS FURTHER ORDERED THAT the period of time from December 13, 2023, through and  
9 including February 28, 2024, is excluded pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i)  
10 and (iv) because it results from a continuance granted by the Court at the parties' request on the basis of  
11 the Court's finding that the ends of justice served by taking such action outweigh the best interest of the  
12 public and the defendant in a speedy trial.

13  
14 IT IS SO ORDERED.

15 Dated: **December 6, 2023**

/s/ *Barbara A. McAuliffe*  
UNITED STATES MAGISTRATE JUDGE